

1 DANIEL G. BOGDEN
2 United States Attorney
3 District of Nevada

4 Chantal R. Jenkins, SBN PA 307531
5 Special Assistant United States Attorney
6 160 Spear Street, Suite 800
7 San Francisco, California 94105
8 Telephone: (415) 977-8931
9 Facsimile: (415) 744-0134
10 E-Mail: Chantal.Jenkins@ssa.gov

11 Attorneys for Defendant

12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 MARY M. STORY,)	Case No. 2:16-cv-02232-RFB-PAL
)	
15 Plaintiff,)	UNOPPOSED MOTION FOR
)	EXTENSION OF TIME
16 v.)	
)	
17 NANCY A. BERRYHILL, ¹)	
Acting Commissioner of Social)	
Security,)	
Defendant,)	
)	

18
19 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security ("Defendant")
20 respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for
21 Reversal and/or Remand, due on May 5, 2017, by one week, from May 5, 2017 to May 12, 2017.
22

23
24 ¹ Nancy A. Berryhill is now the Acting Commissioner of Social Security. Pursuant to Rule 25(d) of
25 the Federal Rules of Civil Procedure, Nancy A. Berryhill should be substituted for Acting
26 Commissioner Carolyn W. Colvin as the defendant in this suit. No further action needs to be taken to
continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C.
§ 405(g).

1 Defendant's counsel requests this additional time because her workload included an oral
2 argument in another social security disability case this week, and she needs more time to review the
3 issues raised in this matter.

4 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this
5 motion, on May 4, 2017.

6 Respectfully submitted this 4th day of May 2017.

7
8 DANIEL G. BOGDEN
9 United States Attorney

10
11 /s/ Chantal R. Jenkins
12 CHANTAL R. JENKINS
13 Special Assistant United States Attorney

14 OF COUNSEL:

15 DEBORAL LEE STACHEL
16 Regional Chief Counsel, Region IX
17
18
19

20 IT IS SO ORDERED:

21 
22 UNITED STATES MAGISTRATE JUDGE

23 DATED: May 5, 2017
24
25
26

CERTIFICATE OF SERVICE

I, Chantal R. Jenkins, certify that the following individual was served with a copy of the UNOPPOSED MOTION FOR EXTENSION OF TIME on the date and via the method of service identified below:

CM/ECF:

Hal Taylor

223 Marsh Avenue

Reno, NV 89509

775-825-2223

Fax: 775-329-1113

Email: haltaylorlawyer@gbis.com

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Mark D. Barrett

Osterhout Disability Law, LLC

521 Cedar Way, Ste. 200

Oakmont, PA 15139

412-794-8003

Fax: 412-794-8050

Email: Mark@mydisabilityattorney.com

LEAD ATTORNEY

PRO HAC VICE

ATTORNEY TO BE NOTICED

Dated this 4th day of May 2017.

/s/ Chantal R. Jenkins

CHANTAL R. JENKINS

Special Assistant United States Attorney